

F I L E D	
CLERK, U.S. DISTRICT COURT	
11/18/2022	
CENTRAL DISTRICT OF CALIFORNIA	
BY:	VAV DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2022 Grand Jury

UNITED STATES OF AMERICA,

CR 2:22-cr-00547-DMG

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1343: Wire Fraud;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft;
18 U.S.C. § 981(a)(1)(C) and
28 U.S.C. § 2461(c): Criminal
Forfeiture]

ALBERT ANSELMO TORRES, JR.,

Defendant.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Glendora Chrysler Jeep Dodge (the "Glendora dealership") was a dealership in Glendora, California, that sold automobiles.

2. Chrysler Capital was an entity headquartered in Dallas, Texas, that issued loans for automobiles.

1 B. THE SCHEME TO DEFRAUD

2 3. Beginning on a date unknown and continuing through at least
3 in or about April 2018, in Los Angeles County, within the Central
4 District of California, defendant ALBERT ANSELMO TORRES, JR.,
5 knowingly and with intent to defraud, devised, participated in, and
6 executed a scheme to defraud the Glendora dealership and Chrysler
7 Capital as to material matters, and to obtain money and property from
8 the Glendora dealership and Chrysler Capital by means of material
9 false and fraudulent pretenses, representations, and promises, and
10 the concealment of material facts.

11 4. The fraudulent scheme operated, in substance, in the
12 following manner:

13 a. Defendant TORRES obtained and possessed, without
14 lawful authority, the social security number of victim A.T., whose
15 name was similar defendant TORRES's name;

16 b. On or about April 14, 2018, in order to obtain a loan
17 to purchase a 2016 Dodge Challenger from the Glendora dealership,
18 defendant TORRES falsely represented in a credit application that:
19 (1) his social security number was that of victim A.T.; and (2) he
20 was employed as a driver by Western Maritime;

21 c. On or about April 14, 2018, in order to process the
22 fraudulent credit application that defendant TORRES submitted to the
23 Glendora dealership, an employee at the Glendora dealership used a
24 platform that utilized the Internet to submit to Chrysler Capital
25 images of defendant TORRES's credit application, which were reviewed
26 by an employee of Chrysler Capital in Dallas, Texas;

27 d. Based on the fraudulent credit application defendant
28 TORRES submitted to the Glendora dealership, Chrysler Capital

1 approved the loan, and Chrysler Capital electronically sent money to
2 the Glendora dealership's account; and

3 e. Defendant TORRES signed a retail installment sale
4 contract, which reflects an amount financed of \$44,290.96, and
5 defendant TORRES took possession of the 2016 Dodge Challenger.

6 C. USE OF THE WIRES

7 5. On or about April 14, 2018, in Los Angeles County, within
8 the Central District of California, for the purpose of executing the
9 above-described scheme to defraud, defendant TORRES caused the
10 transmission, by means of wire and radio communication in interstate
11 commerce, of images of a credit application signed by defendant
12 TORRES, which falsely represented that defendant TORRES's social
13 security number was that of victim A.T. and that defendant TORRES was
14 employed as a driver for Western Maritime.

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1 COUNT TWO

2 [18 U.S.C. § 1028A(a)(1)]

3 On or about April 14, 2018, in Los Angeles County, within the
4 Central District of California, defendant ALBERT ANSELMO TORRES, JR.,
5 knowingly possessed and used, without lawful authority, a means of
6 identification that defendant TORRES knew belonged to another person,
7 namely, the social security number belonging to victim A.T., during
8 and in relation to the offense of Wire Fraud, a felony violation of
9 Title 18, United States Code, Section 1343, as charged in Count One
10 of this Indictment.

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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 981(a)(1)(C) and Title 28, United States
7 Code, Section 2461(c), in the event of the defendant's conviction of
8 the offenses set forth in any of Counts One through Two of this
9 Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any and all
13 property, real or personal, constituting, or derived from, any
14 proceeds traceable to the offenses; and

15 (b) To the extent such property is not available for
16 forfeiture, a sum of money equal to the total value of the property
17 described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section 853(p),
19 as incorporated by Title 28, United States Code, Section 2461(c), the
20 defendant, if so convicted, shall forfeit substitute property, up to
21 the value of the property described in the preceding paragraph if, as
22 the result of any act or omission of the defendant, the property
23 described in the preceding paragraph or any portion thereof (a)
24 cannot be located upon the exercise of due diligence; (b) has been
25 transferred, sold to, or deposited with a third party; (c) has been
26 placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

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4 A TRUE BILL
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8 /S/
9 Foreperson
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